

Environmental Engineering and Waste Management
RIEDEL INDUSTRIAL WASTE MANAGEMENT, INC.

A Subsidiary of Riedel Environmental Technologies, Inc.



"Imagining A Cleaner World"

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RCOM SECTION

August 12, 1991

Mr. Marcus Rivas, Chief
RCRA Enforcement Unit
RCRA Branch
U.S. Environmental Protection Agency
726 Minnesota
Kansas City, Kansas 66101

Mr. Art Groner
Chief, Enforcement Unit
Waste Management Program
Missouri Department of
Natural Resources
P. O. Box 176
Jefferson City, MO 65102

Re: Request for Clarification -
Waste Processing from Roll-offs

RCRA FILE COPY
Mo.DOC. 687.418
DOCUMENT #

Dear Sirs:

This letter is submitted to request clarification of a potential compliance issue regarding authorized bulk storage of materials in containers other than permitted tanks. The basic issue in need of resolution pertains more to the definition of storage than to acceptable storage units. To explain the rationale for this request, the following information is supplied.

SRC proposes to accept bulk solid hazardous wastes and debris (per EPA Paint Filter Protocol Definition) in lined, roll-off containers for processing through the solid fuels program. We recognize that the facility permit does not allow for roll-off storage, especially in areas that have not been developed per the permit specs and certified by an independent P.E. However, it is felt that use of bulk roll-offs for transport only would be beneficial for certain proposed waste streams that are either too bulky or too difficult to accommodated by conventional containers prior to decontainerized introduction into the solid fuels program. To that end, SRC wishes to initiate use of roll-off transport units which will be accepted one at a time and taken directly for off-loading and processing into the solid fuel process. After sampling and off-loading, the roll-off would immediately be placed into continuous processing until empty. If need be, additional shifts will be utilized to insure that the material is not held in "storage", per the definition of 40 CFR Part 260. If contingency developments require storage prior to process, totes, drums or other approved and permitted containers would be utilized to re-package the roll-off contents.

Riedel Industrial Waste Management, Inc.
22 North Euclid
St. Louis, MO 63108
(314) 361-3838
FAX (314) 361-4545

Lafser & Schreiber, Inc.
22 North Euclid
St. Louis, MO 63108
(314) 361-3838
FAX (314) 361-4545

Solvent Recovery Corp.
801 Mulberry
Kansas City, MO 64101
(816) 474-1391
FAX (816) 474-1275

Resource Recovery, Inc.
P.O. Box 902
Hannibal, MO 63401
(314) 248-0730

Riedel Energy, Inc.
P.O. Box 314
R.R. 1, HWY 154
Perry, MO 63462
(314) 565-3232

In our attempt to clarify this issue, SRC has contacted both EPA-Washington and Region VII Field Services personnel as well as the RCRA Hotline. All respondents were in consensus that such activity has not historically been regulated as storage. However, they also noted that such issues were typically region-specific in that there is no quantitative time period associated with the storage definition.

Therefore, SRC requests a summary decision from Region VII commenting on this proposal and its acceptability or denial. If additional conditions need to be addressed for contingent approval, SRC will be pleased to discuss those conditions further with Region personnel and MoDNR officials. An expedient review is requested due to applicability of this issue to upcoming projects.

As always, SRC is appreciative of the cooperative efforts demonstrated by respective agencies. If this request is unclear or in need of further discussion please contact Mr. Steve Johnson of my staff at your earliest convenience at (816)474-1391. SRC earnestly awaits your decision on this issue.

Sincerely,



B. Maitland DuBois
General Manager
Solvent Recovery Corporation

cc: Gary Newbore, Corporate
MoDNR, NW Region
Compliance